



October 18, 2011

Honorable Julius Genachowski  
FCC Chairman  
445 Twelfth Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I submit this letter as a concerned business owner of National Access Long Distance, Inc., a small company located in San Jose, CA. My company has provided long distance services for via third party billing to small businesses across the United States since 2003.

First off, let me say that we applaud your efforts to protect consumers from phone bill cramming. We recognize that there is concern in the marketplace regarding this matter.

At the same time, we also strongly believe that third-party billing services provide great value, and that these convenient services must be preserved for the benefit of both businesses and consumers.

We contend that as a third party biller, we are rigorous in our quality control processes. Further, we contend for reasons detailed below that as a long distance provider who is able to bill its services through the customer's local carrier, it is actually impossible for us to cram anyone.

The reason I say this is because all businesses must go through an independent (and recorded) third party verification prior to any switch occurring in their long distance service. As an added precaution, our company requires that the third party verifier call the customer back immediately following the verification to ensure that the sale is valid. During the three day rescissionary period in which the customer has yet to have been "picced" to our service, our quality control assistants listen to recorded verifications and pay particular attention to ensure the customer understands he/she is switching his/her service to ours.

In the end, we believe that we can and must be permitted to monitor our own performance and be able to bill through third parties, both for our benefit and for the benefit and cost savings of our customers. We value our customers.

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Moreover, the financial impact that eliminating the third-party billing option would have across the nation would be devastating. We implore you to consider the negative consequences that eliminating third party billing would have on the business climate.

Best regards,

A handwritten signature in blue ink that reads "J. Eric Ross". The signature is fluid and cursive, with the first name "J." being small and the last name "Ross" being larger and more prominent.

J. Eric Ross  
President